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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JULIE A. CLEMONS; individually,

Plaintiff,

vs.

UNITED STATES OF AMERICA,

Defendant.

Case No. 2:19-cv-0248-JCM-EJY

**STIPULATION TO PERMIT THE PARTIES TO FILE AN AMENDED
~~PROPOSED~~ JOINT PRETRIAL ORDER**

(THIRD REQUEST)

Pursuant to Federal Rule of Civil Procedure 1, the parties respectfully request that the Court approve this Stipulation to permit the parties to file an amended proposed Joint Pretrial Order (“JPTO”) on or before June 13, 2023. Presently, the parties’ JPTO is due on June 5, 2023. This is the parties’ third request to extend the time to file a JPTO. As previously noted by the parties, an amended JPTO will shorten the length of bench trial, reduce the number of witnesses needed to testify and reduce the costs associated with the bench trial.

This Stipulation is necessary because, while the parties’ respective counsel have been

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communicating and have reached several agreements regarding exhibits and witnesses that will streamline the presentation of evidence at trial, counsel for Plaintiff is waiting to hear back from his experts regarding their availability before proposing trial dates. Plaintiff's counsel cannot propose trial dates until he can confirm the availability of his expert witnesses, one of whom is expected to notify undersigned counsel regarding availability later this week. It is anticipated that undersigned counsel, who has discussed this matter with his experts, will hear back from his witnesses no later than this Friday. Accordingly, a 6-business day extension of time to permit the filing of an amended JPTO is necessary. The parties do not anticipate seeking any further extensions of time to file a JPTO.

/s/ Richard T. Colonna

Richard T. Colonna, Esq.
 Assistant United States Attorney
Counsel for Defendant

Dated: June 5, 2023

Respectfully submitted,

/s/ Paul S. Padda

Paul S. Padda, Esq.
Counsel for Plaintiff

Dated: June 5, 2023

IT IS SO ORDERED:

The parties' Stipulation is approved. The amended proposed JPTO shall be filed on or before June 13, 2023.


 UNITED STATES MAGISTRATE JUDGE

DATED: June 6, 2023